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6 Attorneys for Plaintiff
 SELECT PORTFOLIO SERVICING, INC.,
 7 a Utah corporation

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11 SELECT PORTFOLIO SERVICING, INC., a
 Utah corporation,

12 Plaintiff,

13 v.

14 ABRAHAM VALENTINO, an individual;
 15 JOHN CHU, an individual;
 CORPORATE COUNSEL LAW GROUP LLP, a
 16 California limited liability partnership;
 NESZHAO CONSULTING COMPANY, LLC, a
 17 California limited liability company;
 KEVIN NESBITT, an individual; and
 18 DOES 1 through 25,

19 Defendants.

Case No.: 3:12-cv-00334 SI

STIPULATION AND ~~PROPOSED~~ ORDER
 EXTENDING PLAINTIFF'S TIME TO
 OPPOSE MOTION BY DEFENDANTS
 KEVIN NESBITT AND NESZHAO
 CONSULTING COMPANY, LLC, TO
 DISMISS THE COMPLAINT;
 DECLARATION OF MARCUS T. BROWN

Date: April 20, 2012

Time: 9:00 a.m.

Place: Courtroom 10, 19th Floor

Hon. Susan Illston

21 Plaintiff and Defendants KEVIN NESBITT ("Nesbitt") and NESZHAO CONSULTING
 22 COMPANY, LLC, ("Neszhao") stipulate as follows and respectfully request that the court enter the
 23 proposed order set forth below pursuant to Civil Local Rule 6-2.

24 WHEREAS, on March 7, 2012, Nesbitt and Neszhao filed their amended motion to dismiss,

25 WHEREAS, there have been no previous time modifications on this motion,

26 WHEREAS, the time modification requested herein would not otherwise effect the schedule
 27 for this case, and

28 WHEREAS, Plaintiff reasonably requires additional time to prepare its opposition to

Nesbitt's and Neszhao's motion,

NOW, THEREFORE, Plaintiff, Nesbitt, and Neszhao hereby STIPULATE and agree that Plaintiff's time to oppose Nesbitt's and Neszhao's motion to dismiss Plaintiff's complaint shall be extended up to and including March 30, 2012.

IT IS SO STIPULATED.

DATED: March 20, 2012

WOLFE & WYMAN LLP

By: 

STUART B. WOLFE
MARCUS T. BROWN

Attorneys for Plaintiff
**SELECT PORTFOLIO SERVICING, INC., a
Utah corporation**

DATED: March 20, 2012

LAW OFFICES OF RICHARD S.E. JOHNS,
ORM & GRABSTEIN

By: 

RICHARD S.E. JOHNS

Attorneys for Defendants
**NESZHAO CONSULTING CO. and KEVIN
NESBITT**

DECLARATION OF MARCUS T. BROWN

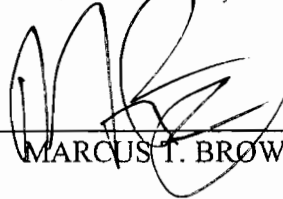
I, Marcus T. Brown, hereby declare as follows in support of the foregoing stipulated request:

1. I am a competent adult. The following is based upon my personal knowledge, and if called to testify, I could and would competently testify thereto.
2. I am an attorney of record for Plaintiff.
3. Plaintiff's opposition to the motion to dismiss filed by Nesbitt and Neszhao is currently due on March 21, 2012.
4. Plaintiff and I require additional time to adequately prepare the opposition to Nesbitt's and Neszhao's motion to dismiss and are, therefore, requesting an additional nine days.
5. There have been no other time modifications in this case, except that some dates were changed due to the judicial reassignments and related recusal.

1 6. To the best of my knowledge, the requested time modification would have no effect on the
2 schedule for this case.

3 I declare under penalty of perjury under the laws of the United States of America and the
4 State of California that the foregoing is true and correct.

5 Executed this 21st day of March 2012 at Walnut Creek, California.

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MARCUS T. BROWN

9 **[PROPOSED] ORDER**

10 Based on the foregoing stipulation and good cause appearing, the court ORDERS that
11 Plaintiff's time to oppose the motion by Defendants Kevin Nesbitt and Neszhao Consulting
12 Company, LLC, to dismiss Plaintiff's complaint shall be extended up to and including March 30,
13 2012.

14 IT IS SO ORDERED.

15 Dated: 3/22, 2012.

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19 HON. SUSAN ILLSTON
20 U.S. DISTRICT COURT JUDGE
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